

**SEALED**

AO 91 (Rev. 11/11) Criminal Complaint

**UNITED STATES DISTRICT COURT**

for the  
Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

MAR 09 2021

Nathan Ochsner, Clerk of Court

United States of America

v.

Adan RIVERA

Case No. C-21-286M

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 22, 2021 in the county of Nueces in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

*Offense Description*

Title 21 USC 841 (a) (1)

Knowingly, intentionally, and unlawfully possessed with the intent to distribute a controlled substance listed in Schedule I the Controlled Substance Act of 1970, to wit: 24 grams (AGW) of heroin.

This criminal complaint is based on these facts:

See attachment A

☒ Continued on the attached sheet.



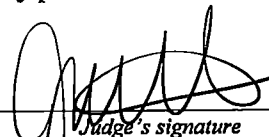
Complainant's signature

Joshua Sorensen, DEA Task Force Officer

Printed name and title

Submitted by reliable electronic means, sworn to, signature attested telephonically per  
Fed.R.Crim.P. 4.1, and probable cause found:

Date: March 9, 2021



Judge's signature

City and state: Corpus Christi, Texas


Julie K. Hampton, United States Magistrate Judge

Printed name and title

ATTACHMENT A

1. On February 22, 2021, members of the Drug Enforcement (DEA), HIDTA Group 1, were conducting surveillance at a known drug location that distributes heroin in Corpus Christi, Texas. At the time of surveillance, Agents observed a silver 2015 Buick (hereinafter referred to as the Target Vehicle-1), Registered to Adan **RIVERA**, parked at the known drug location. A short time after, Agents observed a passenger vehicle (hereinafter referred to as the Target Vehicle-2) arrive at the known drug location. Agents observed a male subject (later identified as **RIVERA**), exit the known drug location then entered into the Target Vehicle-1 and agents believed obtained an item from the Target Vehicle-1. **RIVERA** then approached the Target Vehicle-2 and engaged in a hand-to-hand transaction with the occupant of the Target Vehicle-2.
2. Agents coordinated with a Corpus Christi Police Department (CCPD) patrol unit to conduct a traffic stop on the Target Vehicle-2 for a traffic violation and to investigate. After the Target Vehicle-2 departed the known drug location, a CCPD patrol unit conducted a traffic stop on the Target Vehicle-2. CCPD Senior Officer Cabello arrested the occupant of the Target Vehicle-2 who was found to be in possession of one ounce of heroin. CCPD Senior Officer Cabello contacted DEA Agents and TFO Sorensen and SA Goss responded to interview the arrestee (hereinafter referred to as a Cooperating Individual - "CI").
3. The CI was transported to the DEA Corpus Christi Resident Office to be read Miranda Warnings and questioned about the heroin he/she was in possession of during the time of the aforementioned traffic stop. CI stated he/she wanted to cooperate and provided a statement on who provided the one ounce of heroin to her/him. During a post arrest statement, CI stated **RIVERA** a.k.a. "Dino" provided the one ounce of heroin to her/him. CI stated that **RIVERA** is being looked at by the "Feds" and **RIVERA** distributes large quantities of narcotics in the Corpus Christi, Texas, area.
4. The CI granted agents consent to search her/his cellular telephone to corroborate the purchase of heroin from **RIVERA**. Although the CI later recanted, Agents were able to locate information in the CI's cellular telephone that corroborates the

purchase of one ounce of heroin from **RIVERA**.

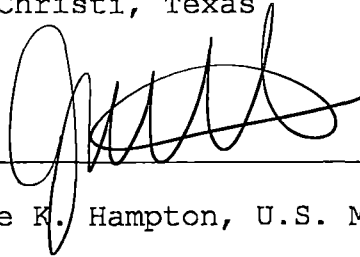


Joshua Sorensen  
Drug Enforcement Administration,  
Task Force Officer

Submitted by reliable electronic means, sworn to, signature  
attested telephonically per Fed. R. Crim. P. 4.1., and probable  
cause found:

Date: March 9, 2021

City and State: Corpus Christi, Texas



Julie K. Hampton, U.S. Magistrate Judge